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10 Attorneys for Defendant
11 National Consumer Telecom & Utilities Exchange, Inc.

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 TIMOTHY TEXEIRA

15 Plaintiff,

16 v.

17 NATIONAL CONSUMER TELECOM &
18 UTILITIES EXCHANGE, INC.; LAC DU
19 FLAMBEAU BAND OF LAKE SUPERIOR
20 CHIPPEWA INDIANS DBA
21 NIIZHWAASWI, LLC DBA LOAN AT
22 LAST; CNU ONLINE HOLDINGS, LLC;
23 ONE MAIN FINANCIAL; DIRECTV, LLC;
24 ATT&T COPR DBA ATT UVERSE;
25 CLARITY SERVICES LLC;
26 BACKGROUNDCHECKS.COM, LLC.

27 Defendants.

28 Case No. 2:22-CV-00153-GMN-DJA

29 **STIPULATION FOR EXTENSION
30 OF TIME FOR NATIONAL
31 CONSUMER TELECOM &
32 UTILITIES EXCHANGE, INC. TO
33 FILE RESPONSE TO COMPLAINT**

34 **(First Request)**

35 Defendant National Consumer Telecom & Utilities Exchange, Inc. (“Defendant” or
36 “NCTUE”), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff
37 Timothy Texeira (“Plaintiff” or “Texeira”), by and through his counsel of record, the Freedom
38 Law Firm, hereby stipulate and agree as follows:

39 WHEREAS, Plaintiff filed its Complaint on January 27, 2022;

40 WHEREAS, Defendant NCTUE was served with the Summons and Complaint on
41 February 2, 2022, making February 23, 2022 its deadline to respond to Plaintiff’s Complaint;

42 WHEREAS, NCTUE and its counsel need additional time to review and investigate
43 Plaintiff’s claims in order to prepare a response to the Complaint;

1 WHEREAS, Plaintiff has agreed to give Defendant NCTUE up through and including
2 March 25, 2022 in which to respond to Plaintiff's Complaint;

3 WHEREAS, there are no other deadlines that are affected by this stipulation that are
4 presently known to the parties; and

5 WHEREAS, this stipulation is not entered into for any improper purpose or to delay.

6 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have
7 up through March 25, 2022 in which to respond to Plaintiff's Complaint.

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9 Respectfully Submitted by:

10 **GREENE INFUSO, LLP**

11
12 /s/ Michael V. Infuso
13 Michael V. Infuso, Esq.
14 Nevada Bar No. 7388
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Approved by:

FREEDOM LAW FIRM

19 /s/ Gerardo Avalos
20 Gerardo Avalos, Esq.
21 Nevada Bar No. 15171
22 8860 S. Eastern Ave., Suite 350
23 Las Vegas, Nevada 89123

17 **O R D E R**

18 **IT IS SO ORDERED.**

19 Dated this 3rd day of February, 2022.

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24 Daniel J. Albrechts
25 United States Magistrate Judge

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GREENE INFUSO, LLP
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